

UNITED STATES EASTERN DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

CHARLES HADDAD,

Plaintiff,

vs.

Case No. 04-CV74932
Hon. Anna Diggs Taylor
Magistrate Judge Donald A. Scheer

INDIANA PACERS, an assumed name, a/k/a
PACERS BASKETBALL CORPORATION,
an Indiana Corporation, JERMAINE O'NEAL,
and ANTHONY JOHNSON,
Jointly and Severally,

Defendants.

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DEFENDANT JERMAINE O'NEAL'S PRELIMINARY WITNESS LIST

Defendant Jermaine O'Neal ("Defendant O'Neal"), by and through his attorneys
Dickinson Wright PLLC and Munger, Tolles & Olson LLP, identifies the following witnesses
who may be called to testify at trial for this matter:

1) The following lay witnesses:

1. Charlie Haddad
2. Jermaine O'Neal, c/o Indiana Pacers
3. Anthony Johnson, c/o Indiana Pacers
4. Ronald Artest, c/o Sacramento Kings
5. Joe Smith, c/o Indiana Pacers
6. Alvin Shackelford, Jr.
7. Frank Haddad
8. Khawla Haddad
9. Ann Rodriguez
10. Rudy Rodriguez
11. Fouad Haddad
12. Diana Haddad
13. Rose Ann Sadia
14. Kris Sadia
15. Elin Haddad
16. George Haddad
17. Ray Cruise
18. Petrous Asmar
19. Audai Twab
20. Damon Anderson
21. Adrian Smith
22. Kent Greenfelder
23. Belinda Neitzelt

2) Any and all treating physicians and medical care providers of Plaintiff, including, but not limited to the following:

1. Dr. John J. Kemerer, 3020 Cooper, Suite 11, Saginaw, MI 48602
2. Dr. Joel Beltran, 800 Cooper, Suite 11, Saginaw, MI 48602
3. Dr. Bong Jong, 4705 Towne Center Road, Suite 304, Saginaw, MI 48604
4. All treating physicians and medical care providers at Pontiac Osteopathic Hospital
5. All treating physicians and medical care providers at Valley Urgent Care
6. All treating physicians and medical care providers at Covenant Emergency Care Center
7. All treating physicians and medical care providers at William Beaumont Hospital
8. The records custodians for each facility where Plaintiff was treated.

3) Any and all current and/or former employees of Palace Sports and Entertainment, Inc. with knowledge or information relevant to this dispute, including, but not limited to:

1. Timothy Smith, Director of Event Operations
2. Michael Dowding
3. Sami Khal, Palace Security Supervisor

4. Ronda Wilson
5. David Hague
6. Erick Macomber
7. Dave Rhodes, Keeper of multi-media records
8. Tyrone Mitchell, NBA Security
9. Jerry Hendon, Pistons Security
10. Alain Moore
11. Tim Wallace
12. Grant Whitehead

- 4) Any and all current and/or former police officers who were on duty or called to duty at the Palace of Auburn Hills during the November 19, 2004 basketball game between the Detroit Pistons and Indiana Pacers.
- 5) Any and all current and/or former players, coaches, managers, officials or employees of the Indiana Pacers basketball team with knowledge or information relevant to this dispute.
- 6) Any and all current and/or former players, coaches, managers, officials or employees of the Detroit Pistons basketball team with knowledge or information relevant to this dispute.
- 7) Any and all persons in attendance at the Palace of Auburn Hills during the November 19, 2004 basketball game between the Detroit Pistons and Indiana Pacers with knowledge or information relevant to this dispute.
- 8) Any and all persons identified in the police report generated by the Auburn Hills Police Department.
- 9) Any and all persons identified in the initial disclosures, supplemental disclosures and witness lists of Plaintiff, the Indiana Pacers, Anthony Johnson and Defendant O'Neal.
- 10) Any and all experts identified by Plaintiff, and not objected to by Defendant O'Neal, whether called or not.
- 11) Any and all experts identified by Defendants Indiana Pacers and Anthony Johnson.
- 12) Any person deposed in this litigation.

- 13) Any individual identified in depositions, written discovery requests or documents produced (by parties and non-parties).
- 14) Any witness listed or identified by any party to this litigation.
- 15) Rebuttal witnesses, as necessary.
- 16) Defendant O'Neal reserves the right to amend and/or supplement this preliminary witness list should the need arise.

Respectfully Submitted,

DICKINSON WRIGHT PLLC

By: /s Richard M. Apkarian Jr.
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Dated: July 18, 2006

PROOF OF SERVICE

STATE OF MICHIGAN)
) SS.
COUNTY OF OAKLAND)

Richard M. Apkarian Jr., being first duly sworn, deposes and says that on the 18th day of July, 2006, he caused to be served a copy of Defendant Jermaine O'Neal's Preliminary Witness List, and this Proof of Service via electronically filing using the ECF system with the clerk of court who will send notice to Jason J. Thompson, Steven M. Potter, and Hideaki Sano.

/s/ Richard M. Apkarian

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